

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONIC CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:22-CV-00422-JRG-RSP

**DECLARATION OF JARED HARTZMAN IN SUPPORT OF
SAMSUNG'S RESPONSE TO PLAINTIFF HEADWATER RESEARCH LLC'S
OPPOSED MOTION TO AMEND INFRINGEMENT CONTENTIONS**

I, Jared Hartzman, hereby declare:

1. I am a Principal with the law firm Fish & Richardson P.C., and counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of Samsung production document bearing beginning bates number SAM-HW00155714.

3. Attached hereto as Exhibit 2 is a true and correct copy of correspondence from Headwater's counsel to Samsung's counsel, dated January 17, 2024.

4. Attached hereto as Exhibit 3 is a true and correct copy of Samsung's Initial Disclosures, dated April 4, 2023.

5. Attached hereto as Exhibit 4 is a true and correct copy of correspondence from Samsung's counsel to Headwater's counsel, dated April 25, 2023.

6. Attached hereto as Exhibit 5 is a true and correct copy of a sign-in sheet for the July 2023 source code inspection.

7. Attached hereto as Exhibit 6 is a true and correct copy of email chain from Samsung Headwater's counsel to Samsung's counsel, dated February 19, 2024.

8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from Samsung's Supplemental Objections and Responses to Headwaters' First Set of Interrogatories (Nos. 1, 2, 5, 7, 16, 17), dated March 15, 2024.

9. Attached hereto as Exhibit 8 is a true and correct copy of Samsung production document bearing beginning bates number SAM-HW00688402.

10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from a deposition of Hongjung Son, taken February 28, 2024.

11. Attached hereto as Exhibit 10 is a true and correct copy of Headwater's Notice of Deposition to Hongjung Son, dated January 31, 2024.

12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from a deposition from Hongshik Kim, taken March 6, 2024.

13. Attached hereto as Exhibit 12 is a true and correct copy of Headwater's Notice of Deposition to Hongshik Kim, dated January 31, 2024.

14. Attached hereto as Exhibit 13 is a true and correct copy of email chain between Samsung counsel and Headwater counsel, dated March 8, 2024.

15. Attached hereto as Exhibit 14 is a true and correct copy of email chain between Samsung counsel and Headwater counsel, dated between September 6 through September 8, 2023.

16. Attached hereto as Exhibit 15 is a true and correct copy of email chain between Samsung counsel and Headwater counsel, dated between September 7 through October 25, 2023.

17. Attached hereto as Exhibit 16 is a true and correct copy of email chain between Samsung counsel and Headwater counsel, dated between September 6 through January 17, 2024.

18. Attached hereto as Exhibit 17 is a true and correct copy of email chain between Samsung counsel and Headwater counsel, dated between September 6 through February 16, 2024.

19. Attached hereto as Exhibit 18 is a true and correct copy of correspondence from Headwater's counsel to Samsung's counsel, dated April 12, 2023.

20. Attached hereto as Exhibit 19 is a true and correct copy of Samsung production document bearing beginning bates number SAM-HW00678131.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of March 2024, in Bethesda, MD.

/s/ Jared Hartzman
Jared Hartzman